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Attorneys for Defendant
Joshua Price

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSHUA PRICE,

Defendant.

Case No. 2:24-CR-00121-WBS

**STIPULATION AND ORDER TO
CONTINUE STATUS CONFERENCE**

Judge: Honorable Dean Coggins.

STIPULATION

1. By previous order this case was set for status conference on August 4, 2025.

2. By this stipulation, the defendants ask to move the status conference until October 20, 2025 and to exclude time between August 4, 2025 and October 20, 2025 under Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

(a) Counsel for defendant was recently appointed and requires time to consult with her client, review the discovery, conduct investigation and otherwise prepare for trial.

(b) Defense counsel was appointed in late July 2025.

(c) Mr. Price is housed in Mendota, CA. Taft is a three-hour drive from defense counsel's place of business. Defense counsel has not been able to visit Mr. Price since being appointed.

(d) Counsel for defendant believes failure to grant the above-requested

1 continuance would deny them the reasonable time necessary for effective preparation, taking into
2 account the exercise of due diligence.

3 (e) The government does not object to the continuance.

4 (f) Based on the above-stated findings, the ends of justice served by
5 continuing the case as requested outweigh the interest of the public and the defendants in a trial
6 within the original date prescribed by the Speedy Trial Act.

7 (g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C.
8 § 3161, *et seq.*, within which trial must commence, the time period of August 4, 2025 to October
9 20, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local
10 Code T4] because it results from a continuance granted by the Court at defendants' request on the
11 basis of the Court's finding that the ends of justice served by taking such action outweigh the best
12 interest of the public and the defendants in a speedy trial.

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14 Dated: July 30, 2025.

Respectfully submitted,

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16 By /s/ Kresta Daly for
Roger Yang
ASSISTANT UNITED STATES ATTORNEY
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19 Dated: July 30, 2025.

BARTH DALY LLP

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21 By /s/ Kresta Nora Daly
KRESTA NORA DALY
Attorneys for JOSHUA PRICE
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ORDER

GOOD CAUSE APPEARING upon the stipulation of the parties it is ordered:

The status conference of August 4, 2025 is vacated. The status conference will be reset for October 20, 2025. The Court finds excludable time through October 20, 2025 under Title 18, United States Code Section 3161(h)(7)(B)(iv) and Local Code T4 to allow for preparation of counsel. The Court finds that the interests of justice are best served by granting the request and outweigh the interests of the public and the defendant in a speedy trial. (18 U.S.C. § 3161(h)(7)(A), (h)(7)(B)(iv).)

IT IS SO ORDERED.

Dated: July 31, 2025



WILLIAM B. SHUBB

UNITED STATES DISTRICT JUDGE